

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRANCIS X. MORGAN

V.

CIVIL ACTION

Doc No# _____

C.M.S. SERVICES
DR. RICHARD SMITH
N.P. JANICE HALL

COMPLAINT

PARTIES

1. PLAINTIFF FRANCIS X MORGAN IS A FEDERAL DETAINEE AT THE ESSEX COUNTY CORRECTIONAL FACILITY IN MASSACHUSETTS AND LIFE LONG CITIZEN OF THE UNITED STATES OF AMERICA.
2. THE DEFENDANTS CMS SERVICES IS LOCATED IN ST. LOUIS MISSOURI
3. ADDED AND PROPER DEFENDANTS ARE DR. RICHARD SMITH AND N.P. JANICE HALL WORK AT THE ESSEX COUNTY CORRECTIONAL MEDICAL DEPARTMENT. I HOPE THEY ARE RESIDENTS OF THIS UNITED STATES
4. I WAS REFUSED THE PROPER ADDRESS OF THIS COMPANY. I WAS REFUSED TYPEWRITER AND LAW LIBRARY ACCESS.
ALSO A COPY OF MY MEDICAL RECORDS FOR THE CLERK OF COURTS.
- 5.

JURISDICTION

THIS COURT HAS JURISDICTION OVER THIS MATTER PURSUANT TO 28 U.S.C. §1332

FACTS

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6. SINCE 10-10-03 I'VE BEEN HAVING SERIOUS CONFLICT WITH THE MEDICAL DEPARTMENT
7. NAMELY DR. RICHARD SMITH AND N.P. JANICE HALL HAVE VIOLATED MY 8TH AND 14TH AMENDMENT
8. HE BY FAILURE, ON MORE THAN 3 OCCASIONS, REFUSED TO TREAT MY MEDICAL NEEDS INCONSISTANTLY AND TOTALLY INDECENT.
9. THEY'RE DELIBERATE MEDICAL INDIFFERENCE HAS RESULTED IN PERMANENT DAMAGE AND SERIOUS MENTAL DISORDERS.
10. I'VE HAD MEDICATIONS PRESCRIBED TO ME BY DR. RICHARD SMITH WITH NO EXAMINATION AND HERE SAY KNOWLEDGE OF MY AILMENTS.
11. THE MEDICATIONS WERE VERY TOXIC TO MY SYSTEM AND MADE ME VERY ILL..
12. WHERE N.P. JANICE HALL IS CONCERNED IS THAT HER AND DR. RICHARD SMITH HAS CONSPIRED AGAINST ME MANY TIMES
13. ONE INSTANT IS JANICE HALL N.P. DENIED ME PAIN MEDICATIONS THAT WAS SUGGESTED BY MY SPECIALIST AT LEMUEL SHATTUCK HOSPITAL
14. HER PROFESSIONALISM WAS IN QUESTION WHEN SHE REFUSED TO TREAT ME OVER FACTS GIVEN.
15. THEN SHE STEPS IN AND TRY-ED TO MAKE AN INSTITUTIONAL DECISION.

16. IN OR AROUND 2-20-04 I SERIOUSLY INJURED MY BACK. I WAS NEVER SEEN.
IF YOU WERE TO TAKE EXRAY OR MRE, YOU'LL SEE A BONE OR DEPOSIT THE SIZE OF A QUARTER.
17. ALSO THE SWING OF MY BACK IS WAY OFF LINE.
18. AND MUCH MORE...
19. MY FEAR IS, AM I GONNA END UP LIKE THE TWO OTHER MEN HAVE DIED IN THIS INSTITUTION IN THE PAST THREE MONTHS?

RELIEF

THAT DR. RICHARD SMITH BE INVESTIGATED BY THE A.M.A. AND AS SUCH HIS LICENCE TO PRACTICE BE VACATED.

YOU SHOULD ALSO INVESTIGATED HOW LONG HE TREATS A PATIENT AND HOW HE BILLS.

IS HE CHARGING THE FEES FOR HOURS OF TREATMENT FOR A 45 SECOND SIT DOWN.

I WOULD LIKE NP. JANICE HALL AND THE NURSES TO BE WARNED ABOUT BEING BIAS AND INDIFFERENCE

THERE IS MENS LIVES IN JEOPARDY.
I'D LIKE TO PREVENT ANYONE FROM NEEDLESS
AND OR WRONGFUL DEATH.

THE 8TH AMENDMENT AND THE 14TH AMENDMENT
WAS AND STILL TODAY IS GROSSLY
VIOLATED.

MY DAMAGES ARE NOW PERMANENT.
I NEED MY BACK STRAIGHTED OUT
MY MENTAL STATE IS WAY OFF.

I'M HAVING DR. MARY ANN ~~DE~~ GALVIN
COMING TO EVALUATE ME.

JUDGE KEETON OF MY CRIMINAL CASE
HAS APPROVED MY FUNDS FOR
HER.

ANY CASH AWARDS IS TO BE DECIDED
BY THE JUDGE AND IS OPEN
FOR DAMAGES.

20. WHERE FOR, THE PLAINTIFF DEMANDS
JUDGEMENT AGAINST DEFENDANT FOR
DAMAGES AND SUCH OTHER RELIEF
AS THIS COURT DEEM JUST

21. THE PLAINTIFF DEMANDS (ASK) A TRIAL BY JURY

Lillian K. Moran PROSE